Attachment P - Falmouth Maintenance Yard

Facility Name: Falmouth Area Headquarters

Location: 1007 Thomas Lane, Fredericksburg, VA, 22405 Latitude: N 38.336771* Longitude W 77.488015*

Date of Visit: October 22, 2012 Entry Time: 2:00 p.m. (approx) Exit Time: 4:15 p.m. (approx)

Site Owner and/or Operator: VDOT – Fredericksburg District

Site Contact: Maury Levine (TOM II, VDOT)

Conducted by: Max Kuker (PG Environmental, LLC), Anthony D'Angelo (PG Environmental, LLC), Allison Graham (U.S. EPA Region 3), and Pete Gold (U.S. EPA Region 3)

Accompanied by¹: Mason Harper (MS4 Permit Writer, Virginia DCR), Morris Walton (Roadside, VDOT), Tracey Harmon (Water Quality Permits Supervisor, VDOT), Rodney Newton (Maintenance Operations Manager, VDOT), Sean Nelson (Assistant Resident Administrator, VDOT), William Losh (Supervisor, VDOT), David Wilson (HAZMAT Compliance Manager, VDOT), Paul Doherty (District Facility Manager, VDOT), Lee Hixon (Consultant, EEE Consulting, Inc.), Chris Swanson (Consultant, EEE Consulting, Inc.)

Site Visit Report Prepared by: Anthony D'Angelo (PG Environmental, LLC)

On October 22, 2012, the EPA Inspection Team conducted a site visit at the Falmouth Area Headquarters (hereinafter, Facility). Dry weather conditions were experienced throughout the inspection activities. Weather history reports from the National Oceanic and Atmospheric Administration station Piedmont RSCH STN – 44-6712 indicated that on 010/18/2012, 0.9" of precipitation occurred and on 10/15/2012, 0.1" of precipitation occurred.

Based on a review and comparison of this site visit location and the United States Census 2000 Urbanized Area designation, it was determined that the Facility is located within the MS4 Compliance Area. The Facility comprises multiple buildings (e.g., office buildings, vehicle maintenance building, storage buildings), a vehicle fueling island, vehicle/equipment storage areas, and materials storage. Various activities are conducted at the Facility, including the following: vehicle storage, repair, and fueling, roadway maintenance, snow removal equipment storage, and salt/sand storage. Stormwater runoff from the Facility is primarily conveyed to an on-site stormwater basin located in the northeast corner of the Facility. The stormwater basin discharges through a riser structure to a roadside conveyance. The impervious area immediately outside of the salt storage shed drains to an on-site salt pond. It should be noted that the site receives run-on from an adjacent vacant bus maintenance facility to the west.

The EPA Inspection Team observed/obtained the following with regard to the Facility:

¹ Sign-in sheets for the site visit are provided after the photograph log.

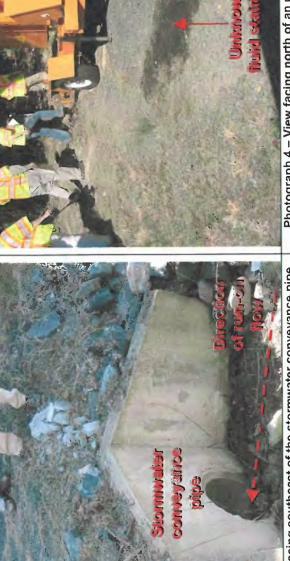
- 1. At the time of the inspection a formal plan for addressing stormwater pollution prevention and good housekeeping at the Facility had not been developed or implemented (e.g., Stormwater Pollution Prevention Plan).
- 2. The VDOT Facility TOM II explained that visual stormwater observations are conducted at the Facility after storm events because a vacant bus maintenance facility to the west conveys oily storm water onto the Facility in the central-west portion of the site (see Photographs 2 and 3). In addition, VDOT provided inspection records in the VDOT Response Inventory (see VDOT Response Inventory Item No. 44.B) for an annual housekeeping inspection that occurred at the Facility on May 24, 2012.
- 3. VDOT Facility staff explained that monthly inspections conducted at the facility include safety, fuel island and underground storage tank inspections. At the time of the inspection, five records of fuel island inspections were available and commenced on February 17, 2012.
- 4. Visible staining from an unknown fluid was observed on the pervious ground surface in the northwestern portion of the facility, adjacent to the Facility solid waste disposal dumpster (see Photograph 4).
- 5. Visible petroleum staining was observed on the impervious surface in the north-central portion of the Facility in the vehicle/equipment parking area (see Photographs 5 and 6). The staining was located upgradient of two Facility storm drain inlets, which convey stormwater runoff to the stormwater basin and to the on-site salt pond (see Photograph 7).
- 6. Multiple vehicles in the central and north-central portion of the Facility were observed with recent spills and/or leaks of unknown fluids underneath, on the impervious surface. Absorbent materials had been implemented to clean the spills and/or leaks; however, the absorbent material had not been disposed of after use (see Photographs 8 and 9). One vehicle was observed with staining underneath; however, absorbent material had not been placed on the spill/leak. Facility staff explained that they had run out of absorbent material.
- 7. A storm drain inlet was observed downgradient from the Facility fuel island, in the central portion of the Facility. VDOT Facility staff did not have procedures for bulk fuel unloading, fuel vendors, or routine fueling of vehicles/equipment. In addition, containment measures leaks or spills were not evident (see Photographs 10 and 11).
- 8. A salt pond located in the northeastern portion of the Facility was observed with high water marks inches below the freeboard capacity (see Photograph 12). The EPA Inspection Team noted concern that the containment pond, if not inspected and emptied prior to large rain events, had the ability to overflow into the stormwater basin (see Photograph 16). The storm water basin drains into a riser structure at the end of the channel, and subsequently discharges through an outfall into a drainage channel on the east side of Old Forge Drive (see Photographs 17 and 18).
- 9. Drip containment plastic sheets were observed implemented under the Facility's salt dispensing equipment on the eastern side of the Facility (see Photograph 13). According to Facility representatives, the plastic sheets were recently installed.
- 10. A storm drain inlet located on the eastern side of the Facility, within a pervious area and adjacent to a sand pile, was observed with a gabion basket implemented for inlet protection (see Photograph 14). Facility staff stated that this gabion basket had been in place for two weeks. The EPA Inspection Team expressed concern that this particular BMP would not be effective in preventing sand and aggregate from entering the storm drain inlet. In addition, an unknown staining was present on the ground surface adjacent to the inlet (see Photograph 15).



Photograph 1 – Falmouth Area Headquarters – 1007 Thomas Lane, Fredericksburg, VA 22405

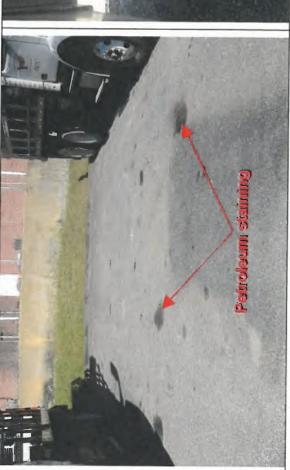


Photograph 2 – View facing north of a stormwater run-on location on the west side of the Facility.



Photograph 3 – View facing southeast of the stormwater conveyance pipe inlet at the run-on location shown in Photograph 2.

Photograph 4 – View facing north of an unknown fluid staining on the ground surface in the northwest portion of the Facility.



Photograph 5 - View facing north of petroleum staining on the impervious surface in the north-central portion of the Facility.



Photograph 6 – Close-up view of recent petroleum staining on the impervious surface underneath a vehicle in the north-central portion of the Facility.



Photograph 8 - View facing northeast of absorbent material implemented in the north-central portion of the Facility. Photograph 7- View facing northwest of storm drain/salt pond drain inlets located downgradient from petroleum staining shown in Photos 5 and 6.

Storm drain inle



Photograph 9 – View facing east of absorbent material implemented in the central portion of the Facility.



Photograph 10 – View facing southwest of an unprotected storm drain inlet located downgradient from the Facility fuel Island. Note the Island did not have containment measures implemented.



Photograph 11— Close-up of the Facility fuel Island shown in Photo 10. Note the fuel Island did not have containment measures implemented.



Photograph 12— View facing northeast of the Facility salt pond located in the northeast portion of the Facility.



Photograph 13 – View facing south of drip containment plastic sheets implemented underneath the Facility salt dispensing equipment.



Photograph 14 – View facing north of a sand stockpile located adjacent to a storm drain inlet.



Photograph 16 – View facing northwest of the stormwater basin on the east side of the Facility, along the northern perimeter. This channel conveys all Facility stormwater runoff.

Photograph 15 – Close-up view of an unknown stain adjacent to a protected storm drain inlet.

Photograph 18 – View facing east of the Facility stormwater outfall, on the east side of Old Forge Drive.

Photograph 17 – View facing east of the Facility stormwater basin outlet riser structure, in the eastern corner of the Facility.

Maint. Fac. Monday



VIRGINIA DEPARTMENT OF TRANSPORTATION SITE VISIT ATTENDANCE RECORD

Location:	Falmouth AHA			
Visit Date:	10/22/12	Start Time: 2:15	End Time: 2: 50	
Roster Administratio	nistration Notes:			

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